

**ORIGINAL**

**OFFICIAL FILE**

**ILLINOIS COMMERCE COMMISSION**

**STATE OF ILLINOIS**

ILLINOIS *SRM*  
COMMERCE COMMISSION

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**PEORIA OPPORTUNITIES FOUNDATION,** )  
**JANE GENZEL, Executive Director,** )

**Petitioner,** )

**vs.** )

**CENTRAL ILLINOIS LIGHT COMPANY** )  
**d/b/a AMEREN/CILCO,** )

**Respondent.** )

CHIEF CLERK'S OFFICE

**CASE NO. 07-0170**

**Administrative Law Judge**

**MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT  
AND ADD ADDITIONAL COMPLAINANTS**

JANE GENZEL, the SSOC OFFICE OF CONCERN, an Illinois not-for-profit corporation, the PEORIA OPPORTUNITIES FOUNDATION, an Illinois not-for-profit corporation and NEW HOPE APARTMENTS, L.P., an Illinois limited partnership, By their Attorney Brian D. Mooty of the law firm Kavanagh, Scully, Sudow, White and Frederick P.C. and in support of their Motion To File Their First Amended Complaint and Add Additional Complainants state as follows:

1. The Complaint herein is a request for an order waiving the separate metering requirements of 83 Ill. Adm. Code 410.130(a) regarding separate metering and an order waiving the requirements of AmerenCILCO's separate metering requirements set forth at Section 4.121(A) of AmerenCILCO's General Terms and Conditions for a permanent supportive housing facility to be established at 301 NE Jefferson, Peoria, IL.

2. Jane Genzel is the Complainant herein and the Executive Director of the Peoria Opportunities Foundation, an Illinois Not for Profit Corporation. (hereinafter POF).
3. POF is one of two general partners of New Hope Apartments, L.P., an Illinois Limited Partnership. (hereinafter, New Hope).
4. The South Side Office of Concern, an Illinois Not for Profit Corporation (hereinafter SSOC) is the other general partner of New Hope.
5. SSOC is the current fee title owner of 301 NE Jefferson Peoria, IL.
6. It is SSOC's and POF's plan to transfer fee title ownership of 301 NE Jefferson Street Peoria, IL to New Hope by the end of April 2007.
7. POF, SSOC and New Hope are interested parties to the cause herein and should be named as additional complainants.
8. POF, SSOC and New Hope as well as the original Complainant request that their first amended complaint be allowed to be filed herein adding POF, SSOC and New Hope as additional Complainants and to allow for additional facts and circumstances to be brought before the Commission regarding the Complainant's request for relief.
9. Pursuant to the telephone conference call *status hearing* held on this matter on March 21, 2007 the Complaint believes that the Respondent does not object to the filing of the First Amended Complaint.
10. A copy of the First Amended Complaint is attached hereto as Exhibit A.

WHEREFORE, Jane Genzel, the South Side Office of Concern, an Illinois not-for-profit corporation, the Peoria Opportunities Foundation, an Illinois not-for-profit corporation and New Hope Apartments, L.P., an Illinois limited partnership, request that their Motion for Leave to File a First Amended Complaint and Add Additional Complainants be granted.

**Respectfully submitted,**

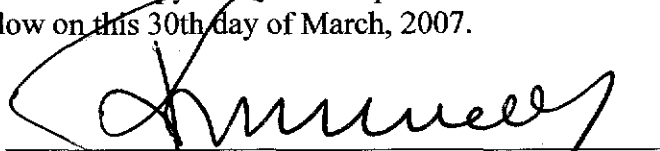
**JANE GENZEL; SSOC OFFICE OF  
CONCERN, an Illinois not-for-profit  
corporation; PEORIA OPPORTUNITIES  
FOUNDATION, an Illinois not-for-profit  
corporation; and NEW HOPE APARTMENTS,  
L.P., an Illinois limited partnership**

BY: 

**BRIAN D. MOOTY  
Licensed in the State of Illinois  
ARDC #6193069  
Kavanagh, Scully, Sudow,  
White & Frederick, P.C.  
301 SW Adams St., Ste. 700  
Peoria, IL 61602-1574**

## CERTIFICATE OF SERVICE

I, **Brian D. Mooty**, do hereby certify that a copy of the foregoing **Motion for Leave to File First Amended Complaint and Adding Additional Complainants** was filed on the Illinois Commerce Commission's docket and that a copy was served upon the Administrative Law Judge and all parties of record listed below on this 30th day of March, 2007.

  
\_\_\_\_\_  
**BRIAN D. MOOTY**

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